

## **EXHIBIT 6**



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March 18, 2019

**VIA Email**

Leah Janus  
Fredrikson & Byron, P.A.  
200 South Sixth Street, Suite 4000  
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Email: [ljanus@fredlaw.com](mailto:ljanus@fredlaw.com)

**Re: *Fair Isaac Corp. v. Federal Insurance Co. et al.*,  
No. 16-cv-01054-WMW-DTS (D. Minn. filed April 21, 2016)**

Dear Leah:

I write regarding the Notices of Rule 30(b)(6) Deposition that Federal issued for Chris Ivey, Thomas Carretta and Steve Webber (the "Notices"), dated March 11, 2019. To confirm our prior correspondence, FICO designates the following witnesses for the various topics: Mr. Ivey testified on March 14 about Topics 6, 15 and 16; Mr. Carretta provide testimony on Topics 4, 14, 22 and 24; Mr. Webber will provide testimony on Topic 19; and Mr. Waid will provide testimony on Topics 9, 17, 18 and 23.

Mr. Waid's testimony regarding Topics 17 and 18 is limited to additional, new questions relating to FICO00057386. Questioning regarding Topic 9 must be consistent with the Court's January 29 Order:

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The deposition as to Topic 9 will proceed with the following limitations: Federal may discover any underlying facts on which a damages analysis could be constructed and any damages calculations or estimates the FICO performed as part of its business operations (as distinct from calculations or analyses overseen by counsel or directed by or involving a retained expert).

(Dkt. No. 192. ) Finally, please find enclosed FICO's objections regarding Federal 30(b)(6) Topics 22-24.

With regard to Federal's Request for Production Nos. 21 and 25, FICO has produced all relevant, responsive documents that were located pursuant to a reasonable search. Specifically, FICO has produced all documents that exist and could be responsive to RFP Nos. 21 and 25 that reside within FICO's contracts/agreements database. No additional documents exist that can be located with a reasonable search.

Sincerely,



Heather J. Kliebenstein